

as to what structure in the figures was being read on the claim elements. While Applicants appreciate the demands on the Examiner's time with each case may force the Office Action to be brief, at the same time it would appear that MPEP § 707.07(d) would dictate at least the ground for rejection over and above the stated statutory basis.

Applicants will assume which structures in the three references the Examiner had in mind and distinguish those structures and methods from the present invention in claims 21 and 36 respectively. The Kellet reference teaches the surface assembly of the main tubing hanger 28 to 4" production tubing 38. Mandrel 54 is connected above tubing hanger 28 and the connections from the hose bundle 60 are made to connections 58. That assembly, at the surface, is then run in on running string 56 and landed on the lockdown seal assembly 26 (see column 4, lines 3-32). This structure and method does not anticipate claims 21 and 36. Claim 21 requires **downhole** engagement of components of a tubular string, which engagement also results in sealingly connecting of components of the control line, also downhole. Claim 36 is a method along the lines of the apparatus claim 21. Kellet teaches away from these claims, in view of the fact that the control line is assembled **at the surface** to connections 58 and then run through the blowout preventers on running string 56 until the tubing hanger 28 lands on the lockdown seal assembly 26.

The Cassity reference teaches the use of sensors to send a signal to the surface that a particular operation on a subsea marine wellhead has been successfully accomplished. As shown in Figs. 2 and 3 one pipe having sensors 50 is inserted into housing 48 to sense the position opposite grooves 54. Applicants could not determine the relevance of this reference to the claims 21 and 36.

Leismer is a downhole disconnect to be operated when the drilling assembly is stuck downhole. The disconnect is clearly assembled at the surface to the drill string. The connections on lines 28 and 30 in the upper half of Fig 8a are threaded compression fittings as is the connection at the bottom of Fig 8b for conduit 28. The upper part of Fig 8 is inserted into the lower part of Fig 9 and the two components are selectively held together until it is time for an emergency release. Conduits 28 and 30 are also assembled at the surface in the lower part shown in Fig. 9. After the disconnect is actuated, the recess 62 is exposed for subsequent fishing operations. This reference has no disclosure of connection of tubing components with an associated control line downhole. This reference is the opposite in its teaching of separating the conduit and the control line downhole.

However, the claims 21 and 36 deal with **assembly** of tubular components **and** associated control line components **downhole**. There is no anticipation of these claims by Leismer. Nor does Leismer suggest these claims to be obvious.

Allowance of all the claims is respectfully requested.

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Date



Respectfully submitted,

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